

Law Offices of
Walter M. Luers, LLC

The Corbit Building
67 Beaver Avenue, Suite 18
Annandale, New Jersey 08801
Telephone: 908.894.5656
Facsimile: 908.894.5729
www.luerslaw.com

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Walter M. Luers, Esq.*

*Also admitted in New York

Writer's Direct Email: wluers@luerslaw.com

VIA CM/ECF

Hon. Susan D. Wigenton, U.S.D.J.
United States District Court
District of New Jersey
Martin Luther King Building
50 Walnut Street
Newark, New Jersey 07102

Re: *Mazo, et al. v. Durkin, et al.*
Docket No. 2:20-cv-08336-SDW-LDW

Dear Judge Wigenton:

We represent the Plaintiff in the above-referenced action. Currently pending before the Court is the motion to dismiss of Defendant Joanne Rajoppi, which is currently returnable October 5, 2020, and has been adjourned once, and the time for us to file opposition has not passed. On September 17, 2020, we requested that this motion be adjourned two motion cycles to synchronize the motion return date of this motion with the motions to dismiss that we anticipate the remaining defendants will file. On September 18, 2020, the Court denied our request on the basis that "it is not clear that defendants Way, Maldonado, and Durkin will file motions to dismiss." (Docket Entry 24). However, the Court also stated that "Plaintiff may request an extension to the extent he needs additional time to file an opposition, etc." We request that the motion to dismiss of Defendant Rajoppi be adjourned one motion cycle to October 19, 2020, on the basis that counsel for Plaintiff requires additional time to prepare and file opposition papers.

All of the Defendants have consented to our request.

If our request is granted, then the new date for Plaintiff to serve and file their opposition papers to Rajoppi's motion to dismiss would be October 5, 2020, and the new date for Rajoppi to serve and file their reply papers would be October 13, 2020.

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Thank you for your consideration of our request.

Respectfully submitted,

/s/ Walter M. Luers

Walter M. Luers

cc: Counsel of Record